SITE ASSESSMENT REPORT
FOR
VALSPAR SITE
CHICAGO, COOK COUNTY, ILLINOIS

March 9, 1992

Prepared for:

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EPA - REGION V

Contract Number: 68-WO-0037

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Date: March 9, 1992

To: Duane Heaton, DPO
EPA Region V, Emergency Support Section

Thru: Thomas Kouris, TATL
Region V, Technical Assistance Team

From: Richard Boelter
Region V, Technical Assistance Team

Sub: Site Assessment Report: Valspar Site
Chicago, Cook County, Illinois
TDD# T05-9112-025
PAN# EIL0765SAA

CC: Paul Steadman, OSC
EPA Region V
Emergency and Enforcement Response Branch
Response Section II

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INTRODUCTION

The Ecology and Environment, Inc. (E & E), Technical Assistance Team (TAT) was tasked by the U.S. Environmental Protection Agency (U.S. EPA) to perform a site assessment of the Valspar Site, Chicago, Cook County, Illinois, under Technical Direction Document (TDD) T05-9112-025. Valspar is a vacant paint plant at 1330 South Kilbourn Avenue in Chicago, Cook County, Illinois (see Figure 1 for site location).

This report (1) documents events chronologically from the date that Valspar donated the property to Goodwill, (2) summarizes the results of past analytical sampling, and (3) evaluates the potential for releases of many hazardous wastes.

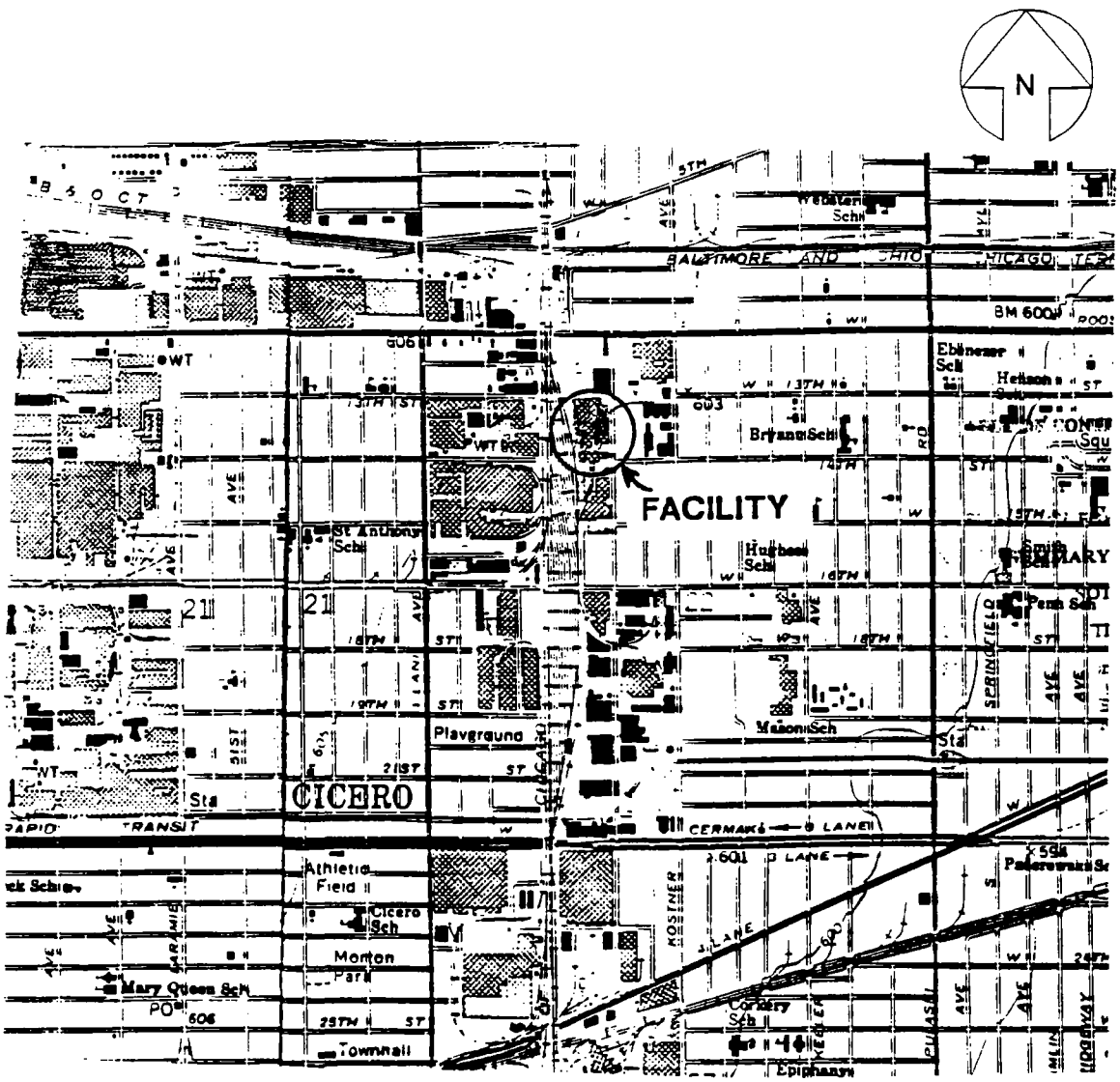
BACKGROUND

The site consists of 33 multi-story buildings on 18.1 acres of land (see Figure 2 for site features). Some of the former production buildings are as high as seven stories. A fire destroyed twelve additional buildings in 1982. The remains of those buildings have been covered with fill. Of the existing buildings, several have been partially or completely burned during a subsequent fire. The area surrounding the site is a mixture of residential and industrial zones. Chicago and Northwestern Railroad tracks are located on the west and next to the site. Spurs of this railroad line cross the site.

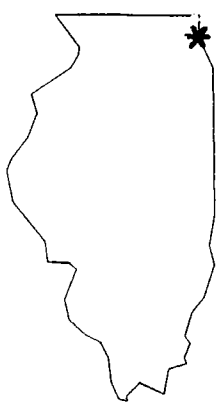
The Valspar Site operated as a paint manufacturing facility since the turn of the century. The original operator of the facilities at the site was Armstrong Paint. Armstrong Paint was subsequently purchased by Elliot Paint at an unknown date. In 1976, Valspar Corporation (Valspar), purchased the stock of Elliot Paint. Following the stock purchase, Valspar leased the property from the former owners of Elliot Paint. Valspar operated the facility between 1976 and 1984 to produce paint, latex, varnishes, and roofing material. Valspar stopped all manufacturing operations at the site and terminated its lease on October 31, 1984. On the same date, Valspar and the American National Bank and Trust Company of Chicago (American National) donated the land, buildings, equipment, and materials remaining on the site to Goodwill Industries of Chicago and Cook County, Inc. (Goodwill), a not-for-profit organization in the State of Illinois.

Since then many events have occurred at the site that complicate the understanding of the overall picture at Valspar. The following is a chronological summary of all known events regarding the site since the date of transfer of the property to Goodwill.

11/26/84 Valspar files a closure plan for the site with the Illinois Environmental Protection Agency (IEPA).



QUADRANGLE LOCATION



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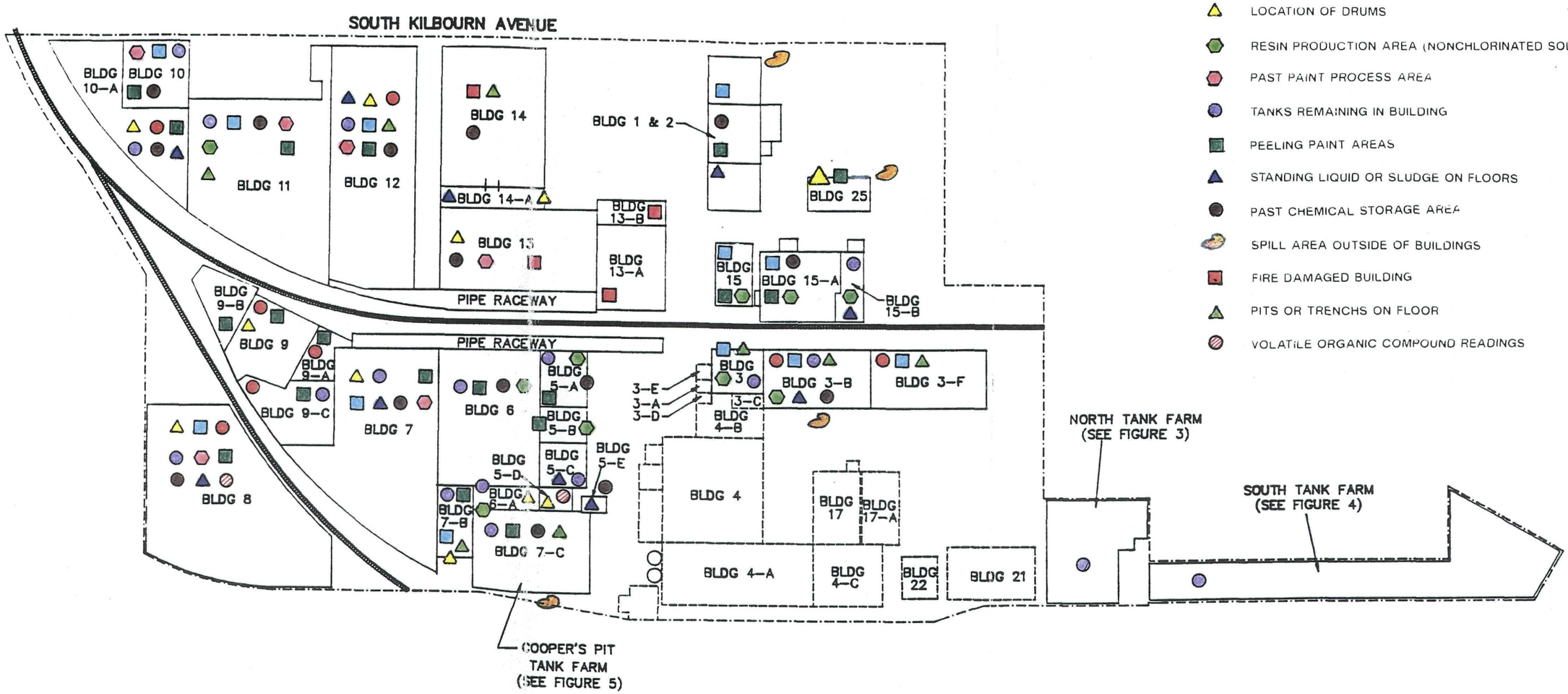
Technical Assistance Team
Region V

TITLE: SITE LOCATION MAP		FIGURE #: 1
SITE: VALSPAR		SCALE: 1:24000
CITY: CHICAGO	STATE: IL	PAN: EIL0765SAA
SOURCE: U.S.G.S.		DATE: 1992



EXPLANATION

- POSSIBLE PCB LOCATION
- POSSIBLE ASBESTOS LOCATION
- LOCATION OF DRUMS
- RESIN PRODUCTION AREA (NONCHLORINATED SOLVENTS)
- PAST PAINT PROCESS AREA
- TANKS REMAINING IN BUILDING
- PEELING PAINT AREAS
- STANDING LIQUID OR SLUDGE ON FLOORS
- PAST CHEMICAL STORAGE AREA
- SPILL AREA OUTSIDE OF BUILDINGS
- FIRE DAMAGED BUILDING
- PITS OR TRENCHS ON FLOOR
- VOLATILE ORGANIC COMPOUND READINGS

LEGEND

- EXISTING BUILDING
- DEMOLISHED BUILDING
- ESTIMATED PROPERTY LINE
- RAILROAD SPUR
- O ABOVEGROUND, OUTDOOR STORAGE TANK

ECOLOGY & ENVIRONMENT, INC.

FIGURE 2

VALSPAR
1330 SOUTH KILBOURN AVENUE CHICAGO, ILLINOIS
FACILITY LAYOUT

2/26/85 Valspar's closure plan is approved by IEPA.

3/25/85 Valspar submits the certification of a professional engineer (M. Rapps Associates) that the closure of the hazardous waste area at the site has been completed according to Valspar's IEPA-approved closure plan.

4/16/85 An IEPA inspection of the facility is conducted to determine closure status of the site. The inspection reveals several tanks, drums, and pipelines containing liquid product that were not included in the approved closure plan. Valspar is held in apparent violation of several regulations and requirements set forth by Resource Conservation and Recovery Act (RCRA) and the Illinois Administrative Code (IAC) (IEPA, 1985b).

6/14/85 An additional inspection and inventory is conducted by the IEPA on June 14, July 1, and 2, 1985.

7/15/85 IEPA issues a Record of Decision (ROD) on July 15, 1985, stating that immediate removal action is required at the Valspar Site.

7/16/85 IEPA issues to Valspar, Goodwill, and American National a "Notice to Parties Liable for a Release or a Substantial Threat of a Release of a Hazardous Substance" [4(q) Notice].

7/25/85 During a meeting held between IEPA, Goodwill, and Valspar, Goodwill and Valspar agree to (1) provide 24-hour security at the facility, (2) remove all baled paper immediately, (3) inventory all hazardous materials at the facility, and (4) develop a facility safety plan (IEPA, 1985e).

10/23/85 A report entitled "Identified Response Action," prepared by James Kinsey (referred to as the Kinsey Report), a consultant for the Valspar, is submitted to IEPA in response to the ROD of 7/15/85.

2/14/86 In Chicago, Illinois, Valspar, Howard R. Conant, (director of Valspar and beneficial owner under the land trust) and Goodwill enter into an Agreement ("Indemnity Agreement") in which Valspar and Conant agreed to indemnify and hold Goodwill harmless from expense, cost, and liability that might arise as a result of Goodwill's agreement to (1) remove from the site any paper and other salvage material designated by IEPA, and (2) pay the guard service posted at the Site by IEPA, and (3) secure the

2/14/8 (cont.) property using padlocks or their equivalent or by payment of additional costs for guards.

4/28/86 An IEPA inspector conducts a RCRA Interim Status Standards inspection of the facility and reports that aboveground tanks are leaking a varnish-like material and that this material is flowing out of various pipes onto the floor. Many violations of RCRA interim status standards were noted. Another site inspection by IEPA on July 26, 1986, reports that conditions remain the same.

7/14/87 Kinsey Consulting sends a letter to IEPA to document the completion of remedial activities. Modifications of the original work plan and a summary of the work that was performed are presented.

9/87 IEPA responds to the Kinsey report in a letter to American National, Goodwill, and Valspar. The letter states that photoionization detector (PID) readings are detecting organic vapors from underground tanks at the site. All parties agree to meet with IEPA to discuss potential soil and groundwater contamination from the underground tanks.

9/88 Valspar submits a work plan to address the underground tank issue. IEPA approves the work plan with two modifications in September 1988.

9/20/88 The City of Chicago files a Complaint for Equitable and Other Relief against Goodwill and Valspar in the Circuit Court of Cook County. The complaint alleges that since January 1988, Goodwill and Valspar have violated the Municipal Code of Chicago by failing to remove abandoned or unused underground flammable liquid tanks and by failing to apply for and obtain a permit for such removal. The city's complaint requested that the Circuit Court levy a fine against Goodwill and Valspar and issue a demolition order for the site under the court's police power to protect the public.

12/18/89 Real Estates Research Corporation (RERC) Environmental is retained by Goodwill to conduct an environmental assessment of the Valspar Site. The purpose of the assessment is to provide an objective and independent professional opinion of the potential environmental risks, if any, associated with the property.

12/20/89 RERC performs a site walk-through and finds positive analytical results of PCB contamination through lab analysis.

5/90 Sometime in May 1990, the Valspar Corporation submits another closure plan to IEPA.

6/5/90 Goodwill Industries sues Valspar Corporation, American National Bank and Trust, and Howard R. Conant for improper closure of the Valspar site.

6/13/90 James Wadsworth of Goodwill writes a letter to IEPA, stating that RERC had been at the Valspar facility on June 11, 1990, and reported an unknown material leaking from pipes during a walk-through investigation for asbestos.

7/19/90 RERC samples at the site and finds positive analytical results for asbestos at the site.

8/19/90 A fire at the facility destroys large portions of buildings 13, 13-A, 13-B, and 14, and causes smoke damage to many other buildings.

8/27/90 A letter from IEPA to Valspar states that IEPA disapproves Valspar's most recent closure plan, submitted on May 29, 1990.

9/4/90 U.S. EPA and the TAT visit the facility and conduct a site assessment. The TAT samples at the site and finds the site very high in polychlorinated biphenyl (PCB) contamination and high in F-listed solvents.

10/90 International Technology Corporation (IT), hired on behalf of Valspar, submits a report, "Settlement Proposal Phase I Report: Response to Deficiencies Closure and Sampling Plan," to IEPA. The report is Valspar's response to the applicability of RCRA regulations concerning various tanks at the facility.

12/7/90 Debbie F. Regel (U.S. EPA) speaks with Bill Seith of the office of the Illinois Attorney General (IAG), who represents IEPA. The IAG office is suing Valspar Corporation.

1/91 The IEPA approves IT's "Settlement Proposal," subject to several conditions and modifications. One condition is that "closure activities must be completed by August 1, 1991" (IEPA, 1991).

3/27/91 Debbie F. Regel (U.S. EPA) speaks with Bill Seith of IAG. Seith has received a re-drafted Consent Order from Conant. IAG is confident that the PRPs will cooperate in cleanup. Final negotiations are proceeding without problems.

7/91 Personnel of PRC Environmental Management, Inc., an environmental consulting firm, tour the facility for U.S. EPA and find the same areas of concern previously found by U.S. EPA, IEPA, the TAT, and RERC. No cleanup efforts have been made. Several areas of concern are indicated in their report.

2/28/92 An Interim Order On Consent (Consolidated Nos. 89-C-5116 and 89-C-9068) was issued in United States District Court (Northern District of Illinois, Eastern Division) and signed instructing the Valspar Corporation and Howard R. Conant to complete and implement a Site Characterization Plan within 150 days (7/28/92) to address any release or threatened release of waste materials from this site. This was acceptable to IEPA and Goodwill Industries, the plaintiffs in this action.

SITE ASSESSMENT ACTIVITIES

On January 22, 1992, the TAT assisted U.S. EPA On-Scene Coordinators (OSCs) Paul Steadman, Steve Faryan, Charles Gebien, and Brad Benning in a walk-through of the Valspar Site. Also present for the site walk-through was Jerry Scheiferle, Facilities Maintenance Engineer for Goodwill Industries. The TAT conducted air monitoring using an HNu photoionization detector and an explosimeter. No significant levels were recorded during the walk-through.

Property access is partially restricted as the facility is surrounded by a six-foot fence topped with barbed wire. The TAT observed signs of vandalism and indications that transients were using the facility. On the basement floors of several buildings, the TAT observed open pits or manholes containing unknown materials. These holes present a hazard for persons who may trip or fall while walking around in these buildings. Hardened tars and resins were observed in many tanks or pits. Insulation material, apparently asbestos, was observed lying in numerous locations in and outside the site, in open boxes, in dumpsters, and falling off pipes. Other hazardous areas of concern that the TAT observed include:

(1) abandoned product containing drums and small containers;
(2) tanks and vats containing unknown chemicals, presumably resins, and F-listed hazardous wastes;
(3) spill areas of potentially contaminated soil;
(4) potentially lead contaminated paint chips; and
(5) frozen sludge or pools of liquid of unknown material on floors.

The TAT also performed an inspection and review of U.S. EPA files pertaining to the site to provide an updated site map, showing present locations and types of contaminants (see Figure 2). Locations of the above areas of concern are detailed on Figure 2.

ANALYTICAL RESULTS

PCBs are regulated under the Toxic Substances Control Act (ToSCA), which requires that PCB spills with concentrations of 50 parts per million (ppm) or greater, be cleaned up and properly disposed of at an approved hazardous waste disposal facility. The National Spill Cleanup Policy (40 CFR, Part 761) requires that cleanup levels for restricted access locations be set at 10 micrograms per 100 cm^2 (ug/100 cm^2) for wipe samples.

Results of the analysis of samples from the TAT Site Assessment conducted at the Valspar Site on September 6, 1990, revealed the presence of F-listed solvents and PCBs in significant amounts (see Tables 1 and 2). The chemicals analyzed are described as EP Toxic Wastes F003 and F005, and are regulated under 40 CFR, Part 261.31. The samples indicate that these F-listed wastes may pose a hazardous threat to human health and environment. Analytical results, from the sampling investigations conducted by RERC Environmental and the TAT, show PCB concentrations higher than U.S. EPA's currently acceptable limits for PCBs (see Tables 2 and 3).

Table 4 lists the results from RERC sampling of suspected asbestos containing materials. Asbestos is a carcinogen. The regulated Occupational Safety and Health Administration's Permissible Exposure Level (PEL) Time-Weighted Average (TWA) limit for asbestos is 0.2 fiber/cc. A material is considered asbestos containing material if it contains greater than 1% asbestos by weight. Both Amosite and Chrysotile are mineral forms of asbestos. The analytical results suggest that asbestos is probably present throughout the facility.

DISCUSSION OF POTENTIAL THREATS

Paragraph (b) (2) of Part 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) lists factors to be considered when determining the appropriateness of a potential removal action at a site. The following discussion presents a summary of those factors that are applicable to the Valspar Site.

Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain. The PCBs associated with the site are laying in pools on some floors within buildings on the site. Evidence of transients in the facilities was noted in several locations on the site. Open pits in the basements of many buildings constitute a tripping or falling hazard. Additionally, residences are located close to the site. Asbestos found on-site could become airborne on dry and windy days.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, other bulk storage containers that may pose a threat of release. The TAT observed open pits, open tanks, vats, and 55-gallon drums containing unknown chemicals. EP Toxic wastes were found on-site. The lack of security at the facility and the observed evidence of vandalism indicates a potential threat of release to the environment, as well as threats of human contact and exposure.

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate. Excessive PCB contaminant levels as high as 448,000 ppm may be in the soil within the property as a result of inadvertent spread by human activity and intrusion throughout the site area. Additionally, lead has been implicated and identified in some locations within this facility area. Analytical results, not withstanding for lead, indicate its presence in significant concentrations to require removal action limits to attain natural background contaminant levels. The presence of PCBs and organic and inorganic lead contaminants in the soils poses the increased risk of exposure and associated health effects to populations who live near the site. The potential for the migration of these contaminants is increased as a result of windblown dusts and precipitation transport off-site to adjacent areas via overland flows and sewage systems.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. The area of the site in Chicago receives an average annual rainfall of 43.2 inches/year. The average wind velocity is approximately 11.6 m.p.h. from the northwest, and the south/southwest. Such weather conditions combined with the uncontrolled and unsecured conditions of this site's contaminants provide a continuing possibility for excessive release of friable asbestos, lead and PCB contaminated soils and dusts to the populace throughout the greater Chicago area.

Threat of fire or explosion. Some of the F-listed solvents may be flammable. Debris and garbage scattered about the buildings pose a potential fire threat. The ease of access to the site by unauthorized personnel increases the fire hazard potential. As well, a fire would allow the transport and spread of identified site contaminants in the form of particulate matter to adjacent properties and local residents.

SUMMARY

Based on the analytical results from two independent sampling teams (TAT and RERC Environmental), PCBs, asbestos, and EP Toxic wastes, F003 and F005, are present at the facility. Other types of hazardous wastes potentially present include contaminated soil and lead contamination.

This report outlines the actual or potential threat to human population, but does not address the areal extent of contaminants. To delineate the lateral and vertical contamination at the Valspar site, the TAT recommends an extensive and comprehensive sampling plan to characterize specific types of hazardous wastes at the site. The sampling plan would include, but not be limited to: (1) air monitoring to identify an asbestos threat in the air; (2) soil sampling for potential volatile organics or lead; (3) vat, tank, and pit sampling to characterize F-listed wastes; and (4) sampling for PCBs. The TAT also recommends that the analytical data from previous investigations undergo review for quality assurance and quality control.

REFERENCES

TAT, Roy F. Weston, Inc., 11/5/90, "Site Assessment Report for Valspar Paint Corporation," TDD # 5-9010-46, prepared for U.S. EPA, written by W. Wilde.

RERC Environmental, 1/19/90, "Environmental Assessment of the Valspar Site," prepared for Goodwill Industries, written by R. Dagnall.

PRC Environmental Management, Inc., 9/27/91, "Preliminary Assessment - Visual Site Inspection 1330 South Kilbourn Avenue Facility," ILD 081 040 107, prepared for U.S. EPA, written by K. Valder.

TABLE 1

ANALYTICAL RESULTS OF TAT SAMPLING *
FOR F-LISTED SOLVENTS
Valspar Corporation, Chicago, Illinois
Samples Taken September 6, 1990

Sample Number	Bldg Locale	Matrix	2-butanone	Toluene	Ethyl Benzene	Benzene	Xylene
S-47	7-C	liquid	BDL	BDL	BDL	BDL	BDL
S-52	6	resin	31.4	5.05	60.06	BDL	165.0
S-55	10	tar	BDL	1.47	20.1	0.77	63.5
S-56	10	soil	BDL	0.474	3.18	BDL	11.5

TABLE 2

ANALYTICAL RESULTS OF TAT SAMPLING *
FOR PCBS
Valspar Corporation, Chicago, Illinois
Samples Taken September 6, 1990

Sample Number	Building Location	Matrix	Aroclor 1248	Aroclor 1254	Aroclor 1260
S-45	3-B	wipe **	BDL	BDL	103,000
S-46	3-B	sludge	2,770	BDL	448,000
S-48	7-C	wipe **	BDL	19.6	BDL
S-49	8	sludge	BDL	7.33	BDL
S-50	9	sludge	BDL	2.49	BDL
S-51	9	sludge	BDL	6.67	BDL
S-53	12	wipe **	BDL	BDL	61,800
S-54	12	liquid	BDL	BDL	3,300

* Samples analyzed by Grace Analytical Laboratories, Inc., in Berkeley, Illinois, under TAT Analytical Services TDD# 5-9009-L01. Samples are listed in parts per million (mg/kg).

** All wipe sample results are reported in units of micrograms per 100 square centimeters (ug/100 cm^2). All other results in both tables are reported in units of parts per million (ppm).

BDL Below Detection Limit

TABLE 3

ANALYTICAL RESULTS OF RERC ENVIRONMENTAL SAMPLING *
FOR PCBS
Valspar Corporation, Chicago, Illinois
Samples Taken December 20, 1989

Sample ID	PCB Type	Results in Milligrams	Micrograms per 100 cm^2
Elec. Room 1	Aroclor 1260	41,000 mg	4,418,103
Elec. Room 2	Aroclor 1260	14,000 mg	1,508,621
Gen. Room 3	Aroclor 1260	120 mg	12,931
Elec. Vault 4	Aroclor 1260	1,500 mg	161,638

TABLE 4

ANALYTICAL RESULTS OF RERC ENVIRONMENTAL SAMPLING
FOR ASBESTOS*
Valspar Corporation, Chicago, Illinois
Samples Taken July 19, 1990

Sample Number	Field Number	Description	Location	Date Analyzed	Sample Composition
1	1018-01	Gray, Metallic, Fibrous & Non-fibrous	Bldg. 11, main entry	7/23/90	AMOSITE: 5% CHRYSOTILE: 45% Cellulose: 5% Non fibrous: 45%
2	1018-02	Tan, Light Brown, Fibrous & Non-fibrous	Bldg. 8	7/23/90	AMOSITE: 40% Non fibrous: 60%

* Analyzed using polarized light/dissecting scope analysis